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**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

Daniel Saldaña,

Plaintiff,

v.

Martha Donovan, et al.,

Defendants.

Case No. 2:24-CV-00895-DSF-AJR

Hon. Dale S. Fischer

**PLAINTIFF'S AND DEFENDANTS
MARTHA DONOVAN, IN HER
CAPACITY AS SUCCESSOR IN
INTEREST TO MICHAEL
DONOVAN, AND LEONARD
MAUGHAN'S NOTICE OF
SETTLEMENT**

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13 *Attorneys for Defendants Martha Donovan, in her capacity as successor in interest
to Michael Donovan, and Leonard Maughan*

14 **PLAINTIFF'S AND DEFENDANTS MARTHA DONOVAN, IN HER**
15 **CAPACITY AS SUCCESSOR IN INTEREST TO MICHAEL DONOVAN,**
16 **AND LEONARD MAUGHAN'S NOTICE OF SETTLEMENT**

17 It is hereby stipulated and agreed by and between Plaintiff Daniel Saldaña,
18 through his counsel of record, Nick Brustin, Anna Benevenutti Hoffmann, Amelia
19 Green, Annie Sloan, Grace Paras, Michael Romano, Susan Champion, Michael
20 Freedman, and Ashwini Mate, and for Defendants Martha Donovan, in her
21 capacity as successor in interest to Michael Donovan, and Leonard Maughan
22 through their counsel of record, Geoffrey Plowden and Mildred K. O'Linn, that:

1. On November 7, 2025, Plaintiff Daniel Saldaña and Defendants Martha Donovan, in her capacity as successor in interest to Michael Donovan, and Leonard Maughan (the “BPPD Defendants”) reached a settlement agreement in the above-captioned matter. As part of this settlement, the BPPD Defendants only will be dismissed, with prejudice, as parties to this action. The parties anticipate filing a stipulation for dismissal with prejudice in mid-December 2025. Pursuant to the terms of the parties’ agreement, filing of the stipulation is contingent on the BPPD Defendants’ payment of the first settlement installation to Plaintiff, which is expected in the first half of December 2025.
2. Because this settlement agreement provides a final resolution to Plaintiff’s claims against the BPPD Defendants, Plaintiff no longer requests that the Court schedule this matter for trial as against the BPPD Defendants.
3. The settlement entered into by Plaintiff and the BPPD Defendants does not affect Plaintiff’s ongoing claims against Defendants Brian Roberts or Keith Stanton (the “BPH Defendants”), which are in the summary-judgment stage of litigation. Plaintiff continues to seek dates for trial as against the BPH Defendants. Further, the settlement entered into by

1 Plaintiff and the BPPD Defendants does not affect the tentative
2 settlement entered into by Plaintiff and Defendants Steven Sowders and
3 County of Los Angeles (the “County Defendants”), which is pending
4 approval by the County. Plaintiff and the BPPD Defendants do not seek
5 to stay any deadlines or litigation with respect to Plaintiff’s claims
6 against the BPH Defendants and/or the County Defendants.
7

8 Dated: November 11, 2025

9 /s/ Amelia Green

10 NICK BRUSTIN
11 ANNA BENEVENUTTI HOFFMANN
12 AMELIA GREEN
13 ANNIE SLOAN
14 GRACE PARAS
15 **Neufeld Scheck Brustin Hoffmann**
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20 **Three Strikes Project**

21 MICHAEL G. FREEDMAN
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Attorneys for Plaintiff

21 /s/ Geoffrey Plowden

22 Geoffrey Plowden

Mildred K. O'Linn

Manning Kass

Attorneys for Defendants Martha

Donovan, in her capacity as

successor in interest to Michael

Donovan, and Leonard Maughan

CERTIFICATE OF SERVICE

I, Isis Arevalo, certify that a true and accurate copy of Plaintiff's and Defendants Martha Donovan, in her Capacity as Successor in Interest to Michael Donovan, and Leonard Maughan's Notice of Settlement was electronically filed with the Clerk of the Court via the ECF system, which will send notification of such filing to all attorneys of record, and serve a copy of the same filing via electronic mail to:

Geoffrey Plowden
Mildred K. O'Linn
Manning Kass
*Attorneys for Defendants Martha
Donovan, in her capacity as
successor in interest to Michael
Donovan, and Leonard Maughan*

Andrew Baum
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*Attorneys for Defendants Los Angeles
County and Steven Sowders*

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Christian Georgely
Hannah Park
**State of California Attorney
General's Office**
*Attorneys for Defendants Brian
Roberts and Keith Stanton*

Dated: November 11, 2025
New York, NY

/s/ Isis Arevalo

Isis Arevalo

Paralegal for Plaintiff